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March 19, 2018

VIA, ELECTRONIC FILING

The Honorable Jocelyn Boyd
Chief Clerk and Administrator
The Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

Re: • **Docket Number 2018-9-E**
• **Petition to Intervene**

Dear Ms. Boyd:

Enclosed for filing, please find the South Carolina Solar Business Alliance, Inc.'s
Petition to Intervene, Docket Cover Sheet and Certificate of Service.

All parties of record have been served. Please notify the undersigned if you there is
anything else you may need.

Respectfully Submitted,

/s/_____
Richard L. Whitt,
Timothy F. Rogers.

RLW/cas

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2018-9-E**

IN RE: South Carolina Electric & Gas Company's)
Integrated Resource Plan (IRP))
)
)
)
)

**PETITION
TO
INTERVENE**

This Commission established Commission Docket 2018-9-E, on October 4, 2017. South Carolina Electric & Gas Company filed its 2018 Integrated Resource Plan (IRP), in Docket 2018-9-E, on February 28, 2018.

Petitioner herein is South Carolina Solar Business Alliance, Inc., ("SCSBA" or "Petitioner"). This Petition to Intervene is filed pursuant to R. 103-825, of this Commission's Rules and Regulations and other applicable Rules and Regulations of this Commission, and Petitioner seeks permission to intervene and be made a party of record in the above-referenced Docket, with full rights of participation.

1. SCSBA is a Public Benefit Non-Profit Corporation, by a conversion filing on May 17, 2017, with the South Carolina Secretary of State's office, originally organized on October 21, 2009, pursuant to Chapter 44 of Title 33 of the South Carolina Code of Laws and, since that date, remaining in good standing with the South Carolina Secretary of State.

2. SCSBA's principal place of business is currently co-located with that of Southern Current LLC at 1519 King Street Extension, Charleston, SC 29405 and SCSBA's mailing address is currently co-located with that of the Hannah Solar Government Services, LLC at 1090 Jack Primus Road, Charleston, South Carolina, 29492.

3. SCSBA is organized for the purpose of promoting and advocating public policy positions supportive of solar power generation in South Carolina.

4. SCSBA is a Public Benefit Non-Profit Corporation, whose Board Members are the following individuals, all of whom conduct solar energy-related business in South Carolina under the company names indicated:

- a. Bret Sowers (Southern Current LLC);
- b. Jarrett Branham (Alder Energy Systems, LLC);
- c. Dave McNeil (Hannah Solar Government Services, LLC);
- d. Andy Israelson (E.ON Climate and Renewables);
- e. Steffanie Dohn (Southern Current LLC);
- f. Mark Walter (Tradewind Energy) and
- g. Tyler Norris (Cypress Creek Renewables).

5. SCSBA's more than sixty (60) Trade Members includes solar energy developers, engineering procurement and construction (EPC) contractors, professional service firms, equipment distributors and equipment manufacturers engaged in the business of solar energy generation in South Carolina and across the nation. All of SCSBA's Board Members' companies maintain offices in South Carolina.

6. Therefore, SCSBA is financially impacted by this Commission's Review of SCE&G's filing, as is outlined in more detail hereinbelow.

7. Specifically, Petitioner, SCSBA's Trade Members conduct business with SCE&G and Petitioner, SCSBA has material interest in the subject matter of this Docket.

8. SCE&G's filing was made pursuant to § 58-37-40, S.C. Code Ann., (1976, as amended) and Commission Order No. 1998-502. SCE&G's filing is SCE&G's annual update to its Integrated Resource Plan, ("IRP").

9. SCE&G's annual IRP filing outlines potential infrastructure which will be needed to match SCE&G's forecasted electricity requirements. SCE&G's IRP filing should contain a demand and energy forecast and the utility's acceptable plan for meeting SCE&G's forecast requirements.

10. As outlined herein, Petitioner, SCSBA has substantial business interests in SCE&G's assigned territory in South Carolina.

11. Petitioner's position is that Petitioner, SCSBA and its Trade Members have a direct and substantial interest in the decision to be made by this Commission in this Docket, concerning this Commission's review of SCE&G's filing in South Carolina and Petitioner's interest cannot be adequately addressed by any other party. Petitioner's further position is that Petitioner, SCSBA will be impacted by SCE&G's IRP planning, which necessarily influences SCE&G's decision making, concerning demand-side and supply-side resources and those decisions impact the cost of electricity for South Carolina consumers. Therefore, the specifics of SCE&G's IRP are important to Petitioner and its Trade Members from a financial standpoint. Petitioner's further position is that Intervention will aid this Commission, by assisting in the development of a full and fair record to address the important issue raised in this Docket. As shown above, Petitioner has a direct and material interest in SCE&G's filing, and this Commission's review and Petitioner's interest are not adequately represented by the current parties in this Docket.

12. This Commission contemplated intervention in IRP filings, as stated in this Commission's Order No. 2012-96.

13. Petitioner should be allowed to intervene in this Docket, with full rights of cross examination, discovery and participation in any Hearing to be scheduled in this Docket.

14. The granting of SCSBA's Petition to Intervene is (i) contemplated by S.C. Code Ann. Section 58-27-865, *et. seq.* (Supp. 2016), (ii) in the public interest and (iii) consistent with the policies of this Commission in encouraging maximum public participation in issues before it and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed.

15. This Petition to Intervene is timely filed with this Commission.

16. Petitioner, SCSBA has previously received approval for intervention from this Commission on numerous occasions, including in recent Commission Docket No. 2015-362-E, Docket No. 2015-8-E, Docket No. 2016-2-E, Docket No. 2016-1-E, Docket 2016-3-E, Docket 2016-9-E, Docket 2016-8-E, Docket 2016-10-E, Docket 2017-2-E, Docket 2017-1-E, Docket 2017-3-E, Docket 2017-305-E and Docket 2018-2-E.

17. Furthermore, Petitioner's Intervention is consistent with this Commission's long standing policy, "...in encouraging maximum public participation in issues before this Commission, and [Intervention] should be allowed so that a full and complete record... can be developed." (Order No.: 2005-725, in Docket No.: 2005-270-G, dated December 16, 2005).

18. SCSBA is represented by counsel in this proceeding:

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WHEREFORE, Petitioner prays for the following relief:

- (a) That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- (b) That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- (c) For such other and further relief as is just and proper.

Respectfully Submitted,

/s/

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Timothy F. Rogers,
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Columbia South Carolina, 29201
(803) 256-4000
Counsel for Petitioner, SCSBA

March 19, 2018
Columbia, South Carolina

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2018-9-E**

IN RE: South Carolina Electric & Gas)	
Company's Integrated Resource Plan)	CERTIFICATE OF SERVICE
(IRP))	
)	

I, Carrie A. Schurg, an employee of Austin & Rogers, P.A., certify that I have served copies of the South Carolina Solar Business Alliance, Inc.'s Petition to Intervene, Docket Cover Sheet and this Certificate of Service, as indicated below, via electronic mail on March 19, 2018.

Jeffrey M. Nelson

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/s/ _____
Carrie A. Schurg

March 19, 2018
Columbia, South Carolina